

A nonprofit organization may qualify for exemption from Federal income tax under section 501(c)(4) of the Internal Revenue Code of 1954 where it provides a community with facilities for rifle, pistol, and shotgun practice and instructions in the safe handling and proper care of weapons.

Advice has been requested whether an organization established and operated in the manner described below may qualify for exemption from Federal income tax under section 501(c)(4) of the Internal Revenue Code of 1954.

The organization was formed to provide supervised facilities in a community for the development of good pistol, rifle, and shotgun marksmanship and for instruction in the safe handling and proper care of firearms. Membership is open to any citizen of the community of good moral character over 18 years old. Its receipts are derived from membership dues, range fees, and proceeds from the sale of ammunition and targets. Disbursements are made for the purchase of ammunition and targets, improvements to the range ground and buildings, expenses of special events, and miscellaneous operating expenses. None of the organization's income inures to the benefit of private individuals.

The organization's principal activity is the operation of a rifle and pistol target range. The general public is permitted full use of the organization's facilities. Qualified members of the organization conduct classes in safe gun handling and supervise the firing on the ranges. The only cost to persons participating in these activities is a nominal fee to cover the cost of ammunition and targets. The facilities are also available free of charge to units of the armed services of the United States for their use in conducting required training courses, to local law enforcement officers, and to junior rifle organizations.

The organization does not maintain a clubhouse. Social affairs are limited to an annual dinner for members, occasional picnics, and special events.

Section 501(c)(4) of the Code provides for the exemption from Federal income tax of civic leagues or organizations not organized for profit but operated exclusively for the promotion of social welfare.

An organization is operated exclusively for the promotion of social welfare if it is primarily engaged in promoting in some way the common good and general welfare of the people of the community. An organization embraced within this section is one which is operated primarily for the purpose of bringing about civic betterments and social improvements. See section 1.501(c)(4)-1 of the Income Tax Regulations.

Providing a community with supervised facilities for firearm shooting, giving instructions in the safe handling and proper care of guns, and teaching better marksmanship are considered to be activities which promote the common good and general welfare of the community. Therefore, the organization is exempt from Federal income tax under section 501(c)(4) of the Code.

An organization which considers itself within the scope of this Revenue Ruling must, in order to establish exemption under section 501(c)(4) of the Code, file an application on Form 1024, Exemption Application, with the District Director of Internal Revenue for the internal revenue district in which is located the principal place of business or principal office of the organization. See section 1.501(a)-1 of the regulations.